CG Docket No. 03-123 and 10-51.

Establishing and maintaining standards for an application is an excellent idea which can benefit everyone who utilizes ITRS, if handled correctly. The key to its success is remembering functional equivalence and starting with very high standards. Evaluation of the existing technology and its features and functionality currently available through each of the ITRS providers as well as similarly functioning programs available in the non ITRS sector would give the FCC an excellent starting point. Combining features from each product that create functional equivalence with ease of use, tracking, reporting and other such shortcuts into a new FCC Standardized program would allow the developer to merge the best of the best and create a superior product. Mandating the use of a single superior standardized application would certainly benefit the users of ITRS by allowing them to know how to use the program regardless of which piece of technology they pick up. However, the concern would be that this standardization would create stagnation in research and development for further advancements in the technology and software and whether such a mandate would be in breach of anti- monopoly laws.

Development of such an application should be contracted to a group of individuals with a vested interest in the final product. The FCC should contract the development of such an application to a diverse group possibly comprised of those individuals responsible for developing the original components currently used by the various ITRS providers as well as Deaf developers for each of these people are familiar with the diverse technical requirements necessary to accommodate the fast paced communication needs of American Sign Language (ASL). Compensation should be commensurate to what would be paid were the programmers hired from the private sector.

By pooling the developers from each of the ITRS providers, the FCC creates a situation where all of the ITRS providers benefit and utilize the same jointly created technology/software thus eliminating their own internally developed applications. Maintaining this group as a research and development team would ensure the continued development and interoperability of future generations of said technology. With communication access points ranging from current video phone technologies, cellular phones, tablets, and desktop computer webcams, it becomes necessary to create a versatile software application that is compatible with the various operating system platforms that is also cross compatible with the existing videophones. Special attention should be given to resolving quality issues currently observed in mobile technology such as laptops, tablets and cellular devices to ensure that reasonable accommodation and interpretation can be facilitated. Current off the shelf technology tends to be unreliable and sub-standard for the use of communicating with ASL as they experience frequent interruptions in signal, visual issues such as pixilation, trailing, blurring, sensitivity to lighting and distorted coloring. Interpreters facing such technologies face an inordinate struggle to see the individuals making the call, let alone maintaining connections and the taxing process of interpreting.

With equal access and functional equivalence in mind, making users responsible for procuring their

own off-the-shelf equipment (tablets, cellular phones, laptops and/or desktop computers), or purchasing/renting video phone equipment from ITRS providers would seem equitable since people who are capable of hearing are responsible to purchase these items for themselves. Having the software copy righted and owned by the FCC and available for download from the FCCs website or links on the ITRS Providers websites for a nominal fee will also serve to offset taxpayer obligation. However, this combined expense would be prohibitive for many deaf individuals who are on a fixed income of Social Security Disability Income. Implementing a credit/waiver system with income guidelines would take this into account and provide at least the home video phone equipment from ITRS providers to those unable to afford it otherwise as well as continuing to provide viable options for those users with limited vision who are dependent upon the larger screens available with the television video phone units.

With purchasing and payment plans come ownership, with that said, iTRS providers currently have policies in place that protect the interpreters from abuse by removing the technology from the abusers home in extreme cases. The FCC may choose to implement similar policies or have policies to discontinue services to those individuals who abuse the privilege. The challenge would be the registration and monitoring of mobile off-the shelf devices to enforce these rulings.

Consumers should be involved in the development, selection, certification and on-going enhancement of either the core or the application by being offered opportunities to provide feedback online or via phone or mail to the development team to incorporate in their developmental plans. Additionally, the team could possibly post previews of upcoming changes online for a period of time asking for public comment.

The most practical approach for technical support for issues relating to the application or its use on their equipment (e.g., network firewall issues, troubleshooting problems) would be to continue to provide it through the technical support lines provided by the ITRS Providers since they will be the ones most knowledgeable of the issues with said technology.

While hosting a competition among existing ITRS access applications and/or commercial standards-based off-the-shelf video conferencing applications would certainly be entertaining, having them work together to develop the application would gain the best end result, have everyone on the same page and require less time to implement. The benefits of these or other alternate approaches would be that it would encourage competition and development with the financial responsibility on the shoulders of the ITRS providers. The drawbacks of these or other alternate approaches are that the time necessary to establish the parameters, outline the requirements of the product, implement the challenge, allow time for development and submission, collect the contributions, evaluate and judge the competition is exorbitant and does not guarantee a viable product.

A. Enhanced iTRS Database Operations

1. Functions and services provided by the enhanced iTRS database should bring iTRS to the functional equivalence of standard telephones.

??? User registration and validation (account and credential creation)- Home and cell phones are registered to the owners to enable 911 operators to more easily send assistance. This same truth holds for Video Phones. By registering the video phone with the address and having this accessible for emergency calls it is functionally equivalent. However, since land line phone service is transferred when a person changes residence for billing purposes, and this does not necessarily hold true for VPs (since billing is currently not an issue), the FCC may consider adding a feature where the software prompts for address updates either periodically or after being unplugged and restored to power. This feature would serve as functional equivalence for the home Video Phones but would not necessarily be as effective for mobile devices for obvious reasons.

??? Per-call user verification (authentication)- People able to hear are not required to identify themselves or authenticate in order to use a standard landline or cellular telephone and are in fact able to allow other people to utilize their home and cellular phones. To require this of ITRS users would not be functionally equivalent.

??? TRS numbering directory functions- creating a phonebook of iTRS users would be wonderful for the ITRS community. However, this calls to mind the question of whether this would be a feature accessible through the software, an online directory or a printed ???Phone book.??? With current iTRS technology requiring high speed internet in order to function, and the likelihood that this will not change, the FCC may consider having the software linked to an online database that is updated periodically as new users are registered, rather than a component of the software itself that would be difficult and time consuming to update. This option would also be ecologically and fiscally proactive.

??? Usage accounting- If the FCC is planning on charging iTRS users and providing plan options with minute limitations similar to cellular plans, this would be a viable option and functionally equivalent, otherwise the service would be similar to tracking utilized by other service providers with unlimited plans that track calls in/out for legal purposes. Hearing people have their calls accounted for and police are able to subpoena those records when necessary, so this would be functionally equivalent.

??? Call routing for the following items should be determined by functionality and ease of use. This is particularly true for the interpreter version of the software application since interpreters are in essence conferencing the calls and their speed in answering and facilitating the calls through queue is integral- especially in the event of 911 calls. Evaluation of the existing interpreter applications for

o To the user-chosen default or the per-call ASL relay CA service provider

o iTRS direct contact To/from other end users (i.e., point-to-point calls)

o To/from the PSTN

o 911 call processing- having the emergency calls automatically advanced to the top of the queue with a feature that allows the address (or gps location for mobile devices) of the individual to automatically populate in order to send EMS Crews to the correct location is vital. Additionally, since

calls are processed throughout America, having access, routing or an entity that provides the local number, to the callers??? local 911/ emergency line can literally make the difference between life and death. (Ie: a cellular caller from Arizona is vacationing in California is routed through Florida for their 911 call. The registered address connects the call to the local 911 in Arizona which would not benefit the person in California.)

??? Vertical features such as video mail (the visible representation of a voice mail for those people incapable of hearing) and address book are comparable to those features that would be found in devices made for people able to hear and encourage functional equivalence.

B. RLSA???s Rate Proposals- I recognize that the FCC is fiscally conscientious and is seeking ways to better steward the budget for which they are responsible, however, reducing the budget and reimbursement rates for iTRS providers would prove counter-productive. The goal for interpreters to handle incoming calls with the speed and efficacy of a dial-tone, requires that those interpreters hired to provide relay services be the highest skilled and credentialed in our field. The previous reduction in rates resulted in hiring freezes implemented by all of the iTRS providers as they struggled to adjust to the change. This meant that the interpreters providing relay services who quit or retired were not replaced. Although the number of calls and registered users increased the time in queue increased exponentially as callers waited for interpreters to become available. A further reduction in rate would create a situation where providers are forced to offer substandard wages (they are barely competitive now) or hire interpreters who are incapable of meeting the challenges of iTRS environment. Moreover with the recent technological advancements opening communication access points(challenging and substandard as they are), the increase in call volume would put pressure on those remaining to perform at a level that would engender burnout, eye strain and repetitive motion injuries for interpreters that are already performing at a dangerous level.

At this point in time iTRS providers are small business entrepreneurs who hire interpreters. The owners and interpreters are motivated to provide a much needed service while earning a living/profit. To infringe on this is to degrade the capitalistic society in which we live. Additionally, as a contractor for services rendered to the United States Government, it is typically acceptable to bid for services and earn a profit, otherwise businesses face stagnation and fail to thrive or choose not to work for the governement. It occur to me that this service, though much more challenging than that faced by TTY/TDD entities (who type from one language into that same language rather than interpreting), could be relegated to a government bureaucracy similar to the State run relay centers if the FCC truly desires a zero percent profit margin. This alternative would create a nationally run relay entity but would also place the financial responsibility of owning and maintaining the facilities, hiring corporate individuals to run it knowledgeably as well as staffing and benefits for everyone from corporate, to interpreters, to the cleaning crews on the government as well-- creating a larger burden than the nominal profits that the iTRS providers currently earn.

C. Open Ratemaking Issues

Budgets for the following areas should absolutely be included in fiscal plans!

??? marketing ??? increases awareness of iTRS, helping the deaf consumers learn of product

availability and how to use it but it also exposes the general public of the iTRS process. Too many people are clueless and scared of relay calls

??? outreach- strides should be made to contact deaf community members and inform them of the communication options available to them. They have been left behind long enough, they cannot enjoy the privilege of rights if they are ignorant of them.

??? research and development- technology is constantly moving forward. To make the choice to leave technology as it is today is not a viable option.